



December 12, 2003



Mr. Kevin Turner
On-Scene Coordinator
U.S. EPA, Region 5
8588 Rt. 148
Marion, IL 62959

Via Certified Mail

Re: RRG/Clayton Chemical Site, Sauget,
Illinois - Docket No. V-W-'03-C-720
MONTHLY PROGRESS REPORT
November, 2003

File: 11331/31861 #2

Dear Mr. Turner:

On behalf of the Performing Members, RRG Clayton Chemical Site Liquids Group (The Group) and in accordance with the October 11, 2002 Administrative Order by Consent and the January 14, 2003 Work Plan approval, we are submitting this progress report for the month of November, 2003.

1. WORK PERFORMED & PROBLEMS ENCOUNTERED DURING NOVEMBER, 2003

- Clean Harbors continued removal of LHS from tanks - Fuel Tank, B-1, B-2, G-6, G-10, G-11, G-5, S-3, 12, 11, 46, S-5, 33, 37, S-1, S-2, G-3, S-4, A-1, 24, 51, 55, and washing tanks - Fuel Tank, B-1, B-2, G-6, G-10, G-11, S-2, 33, 37, S-1, G-3, S-4, A-1, 24, 51, S-3, and S-5.
- Collected additional characterization samples from tanks G-4, 53, S-5, and 24 for analyses.
- Approval from RRG to cut holes in tanks as needed for LHS removal received. No tank cutting performed in November.
- Completed and approved one waste profile (amended CH213385B) for liquid material in tanks (D- and F-code wastewater) and two waste profiles (CH213387 and CH173431) for drums.
- LHS was observed in small pools seeping up from tank bottoms in approximately 5 tanks after washing and rinsing. As requested by Kevin Turner, Clean Harbors will continue to remove this liquid from tanks until demobilization.
- Received analytical results for material in tank G4 - not acceptable for non-hazardous landfilling as analytical results indicate LHS from tank G-4 is hazardous for flash point and benzene. Alternatives for disposal of this LHS are still being evaluated by Clean Harbors - proposal from Clean Harbors is expected week of December 8, 2003.
- O'Brien & Gere on-site inspection changed to part-time; therefore, Jack Daly is no longer on-site. David Haverdink remains as the site manager, with part-time inspection during pertinent events being performed by Alicia Hirschbuehler.
- John Behrens, Clean Harbors Site Superintendent resigned. Toby Viehweg, remains as Site Manager with site support being provided by Rich Fellores
- Approximate LHS removed is 98% of anticipated tank total, excluding tank G-4 (approximately 70,300 gallons) and 0% of drum total; time expended is beyond original schedule. Estimated completion (excluding tank G-4) is December 19, 2003. Formal notification to USEPA of scheduling change, per the Order is pending determination of disposal option for LHS in tank G-4.



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2. ANALYTICAL DATA RECEIVED DURING NOVEMBER, 2003

Received analytical data for liquids in tanks 53, 11, 33, 37, 46, 24, G-8, A-1, S-1, S-5, and G-4.
Received analytical data for liquids in drums 8, 9, 34, 35, 37, 123-126, 128, 156, 163-166, 168, 169, 191, and 217.

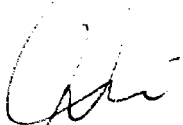
3. WORK ANTICIPATED NEXT MONTH

- Continue liquids removal in tanks 11, 12, 13, 14, 46, 52, S-5, 53, R-1, G-9, G-5, and G-8.
- Determine disposal option for contents of tank G4 and request approval from Group to implement.
- Clean remaining tanks after liquids removed.
- Remove drums containing LHS.

Please contact me at 248.661.3745, ext. 13 if you have any questions.

Very truly yours,

O'BRIEN & GERE ENGINEERS, INC.



Scott L. Cormier, P.E.
Senior Managing Engineer

cc: Mr. Tom Turner, U.S. EPA Associate Regional Counsel, Chicago, IL
Performing Members – RRG Clayton Chemical Site Liquids Group
David Haverdink, P.E. - O'Brien & Gere
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